

1 Ronald H. Bae (SBN 186826)
rbae@AequitasLegalGroup.com
2 Olivia D. Scharrer (SBN 291470)
oscharrer@AequitasLegalGroup.com
3 Carson M. Turner (SBN 345992)
cturner@AequitasLegalGroup.com
4 AEQUITAS LEGAL GROUP
A Professional Law Corporation
5 1156 E. Green Street, Suite 200
Pasadena, California 91106
6 Telephone: (213) 674-6080
Facsimile: (213) 674-6081
7

8 Attorneys for Plaintiff MARK WISE

9 *(Additional counsel on following page)*

10 **UNITED STATES DISTRICT COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA**

12
13 MARK WISE, individually, and on behalf of
14 other members of the general public similarly
situated,

15
16 Plaintiff,

17 vs.

18
19 INTERCONTINENTAL HOTELS GROUP
RESOURCES, LLC, a Delaware limited
liability company; IHG MANAGEMENT
20 (MARYLAND) LLC, a Maryland limited
liability company; INTERCONTINENTAL
21 HOTELS OF SAN FRANCISCO, INC., a
Delaware corporation; SIX CONTINENTS
22 HOTELS, INC., a Delaware corporation; and
DOES 1 through 100, inclusive,
23

24 Defendants.
25
26
27
28

Case No. 3:24-cv-01161-AMO

[Assigned to the Hon. Araceli Martínez-Olguín]

**STIPULATION TO MODIFY BRIEFING
SCHEDULE RE: DEFENDANTS'
MOTION TO STAY PROCEEDINGS**

[Complaint filed: December 29, 2023]

[Removal filed: February 26, 2024]

1 SEYFARTH SHAW LLP
Eric E. Hill (SBN 173247)
2 ehill@seyfarth.com
Ping Wang (SBN 351428)
3 pwang@seyfarth.com
560 Mission Street, 31st Floor
4 San Francisco, California 94105-2930
Telephone: (415) 397-2823
5 Facsimile: (415) 397-8549

6 Leo Q. Li (SBN 293539)
lli@seyfarth.com
7 2029 Century Park East, Suite 3500
Los Angeles, California 90067-3021
8 Telephone: (310) 277-7200
Facsimile: (310) 201-5219
9
10 Yoon-Woo Nam (SBN 284644)
ynam@seyfarth.com
400 Capitol Mall, Suite 2350
11 Sacramento, California 95814-4428
Telephone: (916) 448-0159
12 Facsimile: (916) 558-4839

13 Attorneys for Defendants
INTERCONTINENTAL HOTELS GROUP
14 RESOURCES, LLC; IHG MANAGEMENT
(MARYLAND) LLC; INTERCONTINENTAL
15 HOTELS OF SAN FRANCISCO, INC; SIX
CONTINENTS HOTELS, INC.
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Pursuant to Civil Local Rule 6-2, Plaintiff MARK WISE (“Plaintiff”) and
2 Defendants INTERCONTINENTAL HOTELS GROUP RESOURCES, LLC, IHG
3 MANAGEMENT (MARYLAND) LLC, INTERCONTINENTAL HOTELS OF SAN
4 FRANCISCO, INC., and SIX CONTINENTS HOTELS, INC. (collectively, “Defendants”)
5 by and through their counsel of record, hereby stipulate and agree as follows:

6 WHEREAS, on June 20, 2024, Defendants filed a Motion to Stay Proceedings
7 (ECF No. 18) pending the resolution of *Robert Martinez v. Intercontinental Hotels Group*
8 *Resources, LLC, et al.*, Case No. 37-2023-00056196-CU-OE-CTL (“*Martinez*”), which
9 was filed on December 28, 2023 and is pending in in the Southern District of California;

10 WHEREAS, Plaintiff’s deadline to file a response to Defendants’ Motion to Stay
11 Proceedings is July 5, 2024, and Defendants’ deadline to file a reply is July 12, 2024;

12 WHEREAS, the scheduled hearing date for Defendants’ motion is October 3, 2024;

13 WHEREAS, Plaintiffs’ counsel in *Wise* and *Martinez* have agreed to work together,
14 and the parties in both cases are discussing how to proceed;

15 WHEREAS, in light of these ongoing discussions, the Parties have agreed to
16 modify the briefing schedule for Defendants’ Motion to Stay Proceedings to allow
17 additional time to meet and confer;

18 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED between
19 the Parties, by and through their counsel of record, as follows:

20 1. The deadline for Plaintiff to respond to Defendants’ Motion to Stay
21 Proceedings is extended from July 5, 2024, to July 12, 2024.

22 2. The deadline for Defendant to reply in support of its Defendants’ Motion
23 to Stay Proceedings is extended from July 12, 2024, to July 26, 2024.

24 IT IS SO STIPULATED.

25 ///

26 ///

27 ///

28 ///

1 Date: July 3, 2024

AEQUITAS LEGAL GROUP

2 /s/ Olivia D. Scharrer

3 By: _____

4 RONALD H. BAE

OLIVIA D. SCHARRER

CARSON M. TURNER

5 Attorneys for Plaintiff MARK WISE

6
7 Date: July 3, 2024

SEYFARTH SHAW LLP

8 /s/ Eric E. Hill

9 By: _____

10 LEO Q. LI

ERIC E. HILL

11 YOON-WOO NAM

PING WANG

12 Attorneys for Defendants

13 INTERCONTINENTAL HOTELS GROUP

RESOURCES, LLC, IHG MANAGEMENT

14 (MARYLAND) LLC,

INTERCONTINENTAL HOTELS OF SAN

15 FRANCISCO, INC, and SIX CONTINENTS

HOTELS, INC.

16
17 **Attestation Regarding Signatures**

18 I, Olivia D. Scharrer, attest that all other signatories listed, and on whose behalf this
19 filing is submitted, concur in the filing's content and have authorized the filing.

20 Dated: July 3, 2024

21 By: /s/ Olivia D. Scharrer

22 Olivia D. Scharrer

1 **[PROPOSED] ORDER**

2

3 **PURSUANT TO STIPULATION, IT IS SO ORDERED.** Plaintiff's response to

4 Defendants' Motion to Stay shall be due on July 12, 2024, and Defendants' reply shall be

5 due on July 26, 2024.

6

7 Dated: _____, 2024

8 _____

9 HON. ARACELI MARTÍNEZ-OLGUÍN

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28